

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 20-cv-1319 (JRT/HB)

This Document Relates To:

All Actions.

**PLAINTIFFS' MOTION TO COMPEL
THE PRODUCTION OF DATA AND DOCUMENTS**

Plaintiffs respectfully move this Court, pursuant to Rule 26 of the Federal Rules of Civil Procedure, for an order compelling Defendants to produce documents in accordance with the following:

1. As concerns the Cargill Defendants, structured data related to the terms on which it purchased non-Fed Cattle slaughtered at its two “regional plants” located in Wyalusing, Pennsylvania and Fresno, California in response to All Plaintiffs’ RFP No. 1.
2. As concerns the Cargill Defendants, the Tyson Defendants and Defendant National Beef, the following categories of documents in response to All Plaintiffs’ RFP No. 17, Cattle RFP No. 12, Consumer RFP Nos. 1 and 8-9, and DPP RFP Nos. 40 and 42:
 - a. Unstructured data related to the capacity and utilization of Defendants’ case-ready plants;
 - b. Unstructured data related to the storage capacity of Defendants’ case-ready plants;

- c. Structured or unstructured data concerning Defendants' inventory of case-ready beef; and
- d. Unstructured data related to the opening, construction, expansion, and/or sale of case-ready plants.

3. As regards the Tyson Defendants, structured data concerning their sales of further processed beef products in response to Consumer RFP 14.

4. With respect to Defendant National Beef, profit and loss reports related to its case-ready beef business in response to DPP RFP No. 51.

The grounds for this motion are set forth and supported in the accompanying Memorandum of Law, the Declaration of Daniel O. Herrera and the exhibits attached thereto, the arguments of counsel, and all of the papers and proceedings in this matter.

Dated: July 21, 2022

Respectfully submitted,

/s Daniel O. Herrera

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CERTIFICATE OF SERVICE

I, Daniel O. Herrera, hereby certify that on July 21, 2022, I caused the foregoing to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Daniel O. Herrera